From:	Jennifer Woronets
To:	Chip Humphrey/R10/USEPA/US@EPA; Kristine Koch/R10/USEPA/US@EPA
Cc:	'Jim McKenna (jim.mckenna@verdantllc.com)'; Jennifer Woronets; Laura Kennedy; Amanda Shellenberger; Carl Stivers; Betz, Jan; Bob Wyatt; David Ashton; Fred G. Wolf (Frederick.wolf@total.com); (b) (6) (b) (6) Jennifer Woronets; Jessica Hamilton (Jessica.Hamilton@portofportland.com); Jim McKenna (jim.mckenna@verdantllc.com); Karen Traeger (karen.traeger@total.com); Madalinski, Kelly; Patty Dost; Rick Applegate (Rick.Applegate@portlandoregon.gov); Steve Parkinson
Subject:	FW: Agenda Questions for Friday's Meeting
Date:	08/03/2011 05:06 PM

Chip, Kristine,

Please see below from Jim McKenna.

Thank you,
Jen Woronets ☺
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-----Original Message-----
From: James McKenna [mailto:jim.mckenna@verdantllc.com]
Sent: Wednesday, August 03, 2011 4:46 PM
To: Jennifer Woronets
Subject: Agenda Questions for Friday's Meeting

Chip and Kristine:

Per our conversation earlier this week we are providing to you some questions we'd like to address during our meeting this Friday. We feel this set of questions will help focus our technical conversations on the key issues that need to be resolved regarding Remedial Action Levels (RALs) and the list of Alternatives:

A. For PCBs, BaP, and doxins/furans:

-Do the EPA proposed ranges of RALs for these contaminants substantively add value to the draft FS since it is recognized that an FS level-of-detail is conceptual in nature and at the +50% to -25% design? (e.g., do the EPA RALs appreciably reduced uncertainties in the draft FS to an extent that they justify the added time and cost that will be required to reconstruct the draft FS)?

-EPA's proposed Alternative F will nearly double the footprint and removal volume as well as have a significantly longer construction duration (compared to existing alternatives) without a much additional reduction in SWAC. Again, is this value-added to the project and worth the added time and cost?

-Since the significant risks associated with D/F appears to be limited to a few finite locations, is it more appropriate to demonstrate adequate risk reduction for D/F as a "secondary contaminant" rather than a series of RALs for each alternative?

B. For potential human health risks associated with fish consumption EPA provided the LWG a focused PRG for DDE, but not for DDD, DDT and DDx. Accordingly, the LWG generated RALs for DDE, and on the eco-risk side the LWG is addressing the potential benthic risks associated with DDD, DDE, DDT and total DDx through the comprehensive benthic approach. EPA now proposes to drop the DDE RALs and replace them with a set of DDx RALs. This raises some key technical questions:

-How does development of DDx RALs dovetail with the results of the baseline human health and ecological risk assessments (i.e., are we being consistent with the chemical/receptor pairs, and the spatial extent of exposures)?

-The LWG has generated SMAs based on DDE RALs, and we are addressing the potential risks posed by DDD and DDT as part of the effectiveness evaluation of other "secondary contaminants". Why is this approach not sufficient for EPA since it will adequately address the risks for DDD, DDE and DDT?

-How does development of DDx RALs dovetail with our chemical F&T modeling?

Please let me know if there are questions/issues the EPA team would like to add to the agenda.

Thanks,

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